

JAP:NS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

11-1146 M

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 841(a)(1)
and 841(b)(1)(B)(ii)(II))

YAMPIERE SANTIAGO,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

JOSEPH MOGENIS, being duly sworn, deposes and states that he is a Detective with the New York City Police Department ("NYPD") assigned to the Drug Enforcement Task Force, duly appointed according to law and acting as such.

Upon information and belief, on or about November 21, 2011, within the Eastern District of New York and elsewhere, defendant YAMPIERE SANTIAGO did knowingly, intentionally and unlawfully possess with intent to distribute a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(ii)(II)).

The source of your deponent's information and the grounds for his belief are as follows:^{1/}

^{1/} Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. On November 21, 2011, the defendant YAMPIERE SANTIAGO, arrived at John F. Kennedy International Airport in Queens, New York, aboard Jet Blue Flight No. 714 from San Juan, Puerto Rico.

2. The defendant was first observed at the baggage claim area and appeared to be nervous. He was then observed leaving the baggage claim area and returning inside a number of times. He was approached by Drug Enforcement Task Force agents and officers outside of J.F.K. Terminal 5 and asked if he would answer questions related to his travel. The defendant agreed to answer questions but gave vague answers and continued to appear nervous.

3. The defendant had with him a checked bag. Agents and officers asked if the defendant would consent to a search of the bag. The defendant consented to the search. Agents and officers searched the bag and discovered two packages within an HDTV antenna box.

4. The defendant and his personal effects were then transported to a Drug Enforcement Task Force office located in John F. Kennedy International Airport. At the office, agents and officers probed the packages from the defendant's bag and discovered a white, powdery substance that field-tested positive for cocaine.

5. The total gross weight of the cocaine found in defendant YAMPIERE SANTIAGO's bag is approximately 2,425 grams.

WHEREFORE, your deponent respectfully requests that the defendant be dealt with according to law.

S/ Joseph Mogenis

JOSEPH MOGENIS
Detective
New York City Police Department
Drug Enforcement Task Force

Sworn to before me this
21st day of November, 2011

S/ Andrew Carter

THE HONORABLE ANDREW L. CARTER
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK